



COLOR PIGMENTS MANUFACTURERS ASSOCIATION, INC.

201-15947

June 10, 2005

Mr. Stephen L. Johnson
Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, Virginia 22116

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**Re: Environmental Protection Agency ("EPA")
Voluntary High Production Chemical Program
3,3' Dichlorobenzidine**

Dear Mr. Johnson:

I am writing on behalf of the Color Pigments Manufacturers Association, Inc. ("CPMA") regarding the Environmental Protection Agency ("EPA") High Production Volume ("HPV") voluntary chemical testing program. The CPMA will represent the color pigment intermediate, 3,3' Dichlorobenzidine ("DCB"), Chemical Abstracts Service Number 612-83-9, in the EPA voluntary HPV program.

The CPMA is an industry trade association representing color pigment companies in Canada, Mexico, and the United States. CPMA also represents small, medium and large color pigments manufacturers throughout Canada, Mexico and the United States, accounting for 95% of the production of color pigments in these countries. Color pigment manufacturers located in other countries with sales in Canada, Mexico and the United States, and suppliers of intermediates, other chemicals and other products used by North American manufacturers of color pigments are also members of the Association. Color pigments are widely used in product compositions of all kinds, including paints, inks, plastics, glass, synthetic fibers, ceramics, color cement products, textiles, cosmetics and artists' colors.

DCB was previously represented by the DCB Coalition. A letter dated November 29, 1999 from the DCB Coalition to EPA is available on the EPA HPV website (document identification number AR201-11678). The DCB Coalition letter indicates that the members of the DCB Coalition were: Clariant Corporation, Korea Hyeop Hwa Chemical Industry Company, Ltd., OmniSpecialty and Lomac LLC, a subsidiary of PCL Group, Inc. Subsequently, Hugh M. Smith, Ph.D., Senior Staff Consultant for the Sun Chemical Corporation Colors Group submitted a letter dated December 20, 2001 (also available on the EPA-HPV website, document identification number AR201-13501). This letter indicated that Sun Chemical Corporation Colors Group acquired the business of PCL Group, Inc. and that a Sun Chemical Corporation Colors Group representative would replace the Lomac LLC representative on the DCB Coalition.

All of the companies comprising the membership of the DCB Coalition will now work through the CPMA. As a result, the prior sponsorship letter and commitment made by the DCB Coalition is rescinded and replaced by this letter and commitment. There should be no further correspondence from or to the DCB Coalition.

We understand that the voluntary program will involve the assessment of certain characteristics for DCB. Since so many of EPA's published procedures are identified as drafts, it is difficult to commit to adhering to the programs procedures. However, we will assess DCB and submit a robust summary of existing data. We will also submit a test plan, if our assessment determines that there is insufficient data available to prepare a robust summary.

We are reviewing currently the status of DCB with respect to various existing programs, including the ICCA chemical initiative and the Organization for Economic Cooperation and Development SIDS international program. CPMA reserves the right to defer the review of DCB under the HPV program if DCB or an analog of it has been the subject of another commitment to either the EPA HPV program or a similar international program. CPMA further reserves the right to withdraw from this commitment should the HPV program, when and if finalized, proves to be different from that currently understood by CPMA.

Since DCB has been used in commerce for many years, there may be extensive data available with respect to this chemical. Our data collection and review of available information will require considerable time. Therefore, a precise date for completion of a robust summary and a test plan cannot, at this time, be provided, although analysis should not extend beyond the end of 2006.

All questions should be addressed to me at:

Color Pigments Manufacturers
Association, Inc.
300 North Washington Street
P.O. Box 20839
Alexandria, Virginia 22320-1839

Telephone: 703-684-4044
Facsimile: 703-684-179
E-mail: JLR@CPMA.com
Attn: J. Lawrence Robinson, President

I will, in turn, forward requests to the appropriate member representatives for review and response. Please call if there are any questions or comments.

Sincerely,

J. Lawrence Robinson
President